



ATLANTA CINCINNATI COLUMBUS LOS ANGELES WASHINGTON, D.C.
CHICAGO CLEVELAND DAYTON NEW YORK

December 5, 2024

VIA ECF

The Honorable Andrew L. Carter Jr., U.S.D.J.
United States District Judge
United States District Court
for the Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

USDC SDNY
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Re: United States of America v. Yu, et al., 20-cr-00648-ALC

Dear Judge Carter:

We represent defendant Valeria Ruth Hachon ("Hachon") in the above-referenced matter. We now write to this Court to request a modification of its prior Order, dated November 12, 2024, regarding this Court granting permission to Ms. Hachon to travel to Israel so she could take her children to Israel as part of her divorce agreement with her former husband. (Dkt. **150**).

Given the current situation in the Middle East, there are very few flights in and out of Israel. As a result, Ms Hachon was only able to secure airline tickets for her and her family whereby she would depart from the United States on December 12, 2024 and return on December 28, 2024. Thus, we would request permission from the Court to modify her departure date from December 15, 2024 to December 12, 2024 as well as her return date from January 5, 2025 to December 28, 2024. Essentially, she has cut out approximately 5 days from her travel request.

We notified the United States Attorney's Office for the Southern District of New York and United States Pretrial Services on or about November 27, 2024 of this request. United States Pretrial Services agreed to the request, but we have yet to hear from the Government. We needed to submit this request to the Court given the time considerations involved in asking for the modification concerning travel and the proposed travel dates. We thank the Court for its consideration of this matter.

Respectfully submitted,

Ernest Edward Badway

The application is **GRANTED**.

So Ordered.

cc: All Counsel (via ECF)

12/9/24